UNITED STATES DISTRICT COURT DISTRICT COURT OF MASSACHUSETTS

)	
UNITED	STATES)	
)	
v.)	1:22-cr-10057-MLW-1
)	
MONICA	CANNON-GRANT)	
)	

REQUEST TO FILE MOTION UNDER SEAL

MOTION TO AMEND CONDIITONS OF RELEASE TO PERMIT DEFENDANT TO SERVE AS FIDUCIARY CUSTODIAN FOR FATHER

NOW COMES the Defendant, MONICA CANNON-GRANT in connection with the above-captioned matter and respectfully requests that this Honorable Court allow the below motion to be filed under seal to protect the Defendant and her father and the related health and financial concerns that need not be public record.

The Defendant respectfully seeks permission from this Honorable Court to serve as a Fiduciary Appointed Custodian for her father. Specifically, this motion seeks to have the Court amend conditions of release and grant Defendant permission to serve as Fiduciary Custodian with Power of Attorney on behalf of her father, to handle his finances and limited set income from the Department of Veterans Affairs Office and Social Security benefits each month.

On the $1^{\rm st}$ of the month and $3^{\rm rd}$ of the month her father receives monthly benefits totaling approximately \$4300 per

month. Her father is

The VA indicated that he needs someone to take over his finances to help handle his monthly bills and preserve his limited set income. Each month, he runs out of funds, his checks have been stolen at least three times, he loses his debit cards, and goes long periods of time without funds or paying bills which total less than his monthly income. Given ______, the VA requested intervention by granting the fiduciary responsibility to a family member. There is no one else that can support him. Other family members do not live in the Commonwealth, and the Defendant is the best and only option. Given this, her father has requested that she be appointed in response to the VA's requests for this intervention.

Accordingly, the Defendant respectfully requests that this Honorable Court amend her conditions of release to allow her to serve her father in this limited capacity and handle his finances each month as the appointed fiduciary for the VA and Social Security benefits that he receives each month. The Defendant is willing to sign a release for access to the accounting, or provide accounting to the Probation Department to monitor the requested appointment. This motion is filed on behalf of the Defendant on information and belief of the

Defendant and may be supplemented or provided in an Affidavit as needed.

WHEREFORE, the Defendant respectfully requests that this Honorable Court allow this to be filed under seal and further requests that this Court amend her conditions of release to allow her to serve her father in this limited capacity.

Respectfully submitted, MONICA CANNON-GRANT, By her attorney,

/s/ CLMALCOLM

Christopher L. Malcolm
BBO No.: 684440
266 Willowgate Rise
Holliston, MA 01746
617-645-0089
clmalcolm@gmail.com

Date: 2/3/2023

CERTIFICATE OF SERVICE

I, Christopher L. Malcolm, Attorney for MONICA CANNON GRANT, hereby certify that on this date I served a copy of this motion by electronic notice / email on the US Attorney's Office.

/s/ CLMALCOLM

Date: 2/3/23

Christopher L. Malcolm